

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	)	
	)	
v.	)	Criminal No. 12-92
	)	
RICHARD BUSH	)	
MAYANK MISHRA	)	
WILLIS WHEELER	)	

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UNITED STATES OF AMERICA	)	
	)	
v.	)	Criminal No. 13-268
	)	
MAYANK MISHRA	)	

**GOVERNMENT'S MOTION TO UNSEAL MOTION TO CHANGE  
DATE FOR HEARING ON PRETRIAL MOTIONS**

AND NOW comes the United States of America, through its counsel, David J. Hickton, United States Attorney for the Western District of Pennsylvania, and Brendan T. Conway, Assistant United States Attorney for said district, and respectfully submits its Motion to Unseal Pleadings. For the reasons set forth below, the Court should grant the government's motion and change the date for the hearing on pretrial motions.

On September 22, 2014, the government filed, under seal, its Motion to Change Date for Hearing on Pretrial Motions in both of the above-referenced cases. It was filed in Criminal No. 12-92 at Docket Number 191, and in Criminal No. 13-268 at Docket Number 75. This pleading detailed an FBI operation, in conjunction with other federal and local law enforcement officials, where they intended to arrest dozens of violent individuals and execute numerous search warrants as the culmination of an extensive investigation of drug trafficking activity. The agent, Special Agent O'Mahoney, was the primary case agent for the case that resulted in the operation,

as well as a witness in the cases at hand, and, therefore, his presence was necessary during the FBI operation and he was not able to be present in court for the October 23, 2014 hearing on pretrial motions. The government requested that its Motion to Change Date for Hearing on Pretrial Motions be filed under seal so as not to jeopardize the sensitive nature of the FBI operation. As of the date of this filing, the FBI operation has been completed, and, therefore, the government's Motion to Change Date for Hearing on Pretrial Motions and the related Orders no longer need to remain sealed.

WHEREFORE, for the reasons set forth above, the Court should grant the government's motion and unseal the government's Motion to Change Date for Hearing on Pretrial Motions and the related Orders.

Respectfully submitted,

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